



*mailed: 5/7/04*  
**Oregon**

Theodore Kulongoski, Governor

**Department of Environmental Quality**

Northwest Region Portland Office

2020 SW 4<sup>th</sup> Avenue, Suite 400

Portland, OR 97201-4987

(503) 229-5263

FAX (503) 229-6945

TTY (503) 229-5471

May 7, 2004

Jim Stahly  
General Manager  
Linnton Plywood Association  
10504 NW St. Helens Road  
Portland, OR 97231

Re: Source Control Decision for the Linnton Plywood Association Facility/  
Columbia Sand & Gravel Facility at 10504 NW St. Helens Road, Portland OR  
ECSI Nos. 2351 & 2373

Dear Mr. Stahly:

The Oregon Department of Environmental Quality (DEQ) reviewed the Pre-Remedial Investigation (Pre-RI) conducted for the Linnton Plywood Association/Columbia Sand & Gravel (LPA) facility located at 10504 NW St. Helens Road in Portland, Oregon. DEQ has determined that the upland portion of the LPA site does not appear to be a current or ongoing source of contamination threatening the river, and that no additional source control measures are needed to protect the Willamette River based on the information submitted for the Pre-RI. This Source Control Decision removes the LPA site from the list of sites that have potential current upland sources of contamination potentially threatening the Willamette River.

This conclusion is based upon an evaluation solely of sources and pathways which may have connection to the river, the current uses of the property (warehousing in building formerly used to produce plywood, and aggregate processing in the southern portion of property), and presumes that continued action will be taken to control potential contaminant transport via the stormwater pathway by maintaining catch basin sediment controls. We anticipate that potential historic releases from the LPA facility that may have impacted Willamette River sediment will continue to be investigated by the Environmental Protection Agency (EPA).

The Pre-RI was not designed to evaluate all potential sources of contaminants at the LPA facility (e.g., those upland sources that do not have a complete contaminant migration pathway to the river), nor does it reach conclusion with respect to risks to human health or the environment associated with pathways other than those having connection to the Willamette River and/or riverbank sediments. The Source Control Decision presented in this letter focuses on the evaluation of current upland sources of contamination potentially threatening the Willamette River.

Notice of the proposed source control decision was published in the Oregon Secretary of State's Bulletin and furnished to EPA by letter dated August 1, 2003. DEQ requested public comment and EPA review and comment on DEQ's conclusion that the LPA site is not currently a source

of contaminants to the Portland Harbor during the month of October 2003. DEQ addressed EPA's comments and no public comments were received by DEQ during the October 2003 comment period.

Please refer to the Department's July 31, 2003 Staff Report titled - "Completion of Pre-Remedial Investigation at the Linnton Plywood Association/Columbia River Sand & Gravel Facility" (attached) which provides a summary of the Pre-RI information used as the basis for this Source Control Decision for the upland portion of the site.

Environmental investigations conducted to date at LPA, while substantial, have not yet addressed all potential environmental concerns at the site. DEQ would require additional environmental evaluations in order to make a determination that "No Further Action" is required. LPA has several options for continuing its characterization of the site:

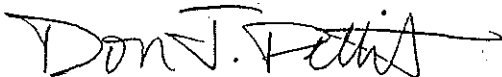
- Participate in DEQ's Voluntary Cleanup Program (VCP), with DEQ oversight;
- Conduct work through DEQ's Independent Cleanup Pathway with subsequent DEQ review; and
- Exit the VCP and remain on DEQ's Site Assessment list since the site no longer presents a high priority threat to human health and the environment.

Please contact the VCP Representative, Dana Bayuk, at 503-229-5562 regarding your intended actions.

The DEQ Environmental Cleanup Site Information Database will be updated to reflect this decision. Lastly, the DEQ will resume the process of adding the site to the Confirmed Release List now that releases of hazardous substances have been documented at the site.

If you have any questions about this review or the approval process, please contact me at (503) 229-5492.

Sincerely,



Don J. Pettit  
Cleanup & Emergency Response

Attachments: Attachment 1- July 31, 2003 "Staff Report for Completion of Pre-Remedial Investigation - Linnton Plywood Association/Columbia Sand & Gravel Facility, Portland, Oregon"

cc: Terry Hosaka C/ER, DEQ  
Jim Anderson, C/PH, DEQ  
Fenix Grange, C/PH, DEQ

Tara Martich - EPA, Region 10  
1200 Sixth Avenue  
Seattle, Washington 98101